

ERIC L. CRAMER (*pro hac vice*)  
 MICHAEL DELL'ANGELO (*pro hac vice*)  
 BERGER MONTAGUE PC  
 1818 Market Street, Suite 3600  
 Philadelphia, PA 19103  
 Telephone: (215) 875-3000  
 Facsimile: (215) 875-4604  
 ecramer@bm.net  
 mdellangelo@bm.net

BENJAMIN D. BROWN (*pro hac vice*)  
 COHEN MILSTEIN SELLERS & TOLL, PLLC  
 1100 New York Ave., N.W.,  
 Suite 500, East Tower  
 Washington, DC 20005  
 Telephone: (202) 408-4600  
 Facsimile: (202) 408 4699  
 bbrown@cohenmilstein.com

JOSEPH R. SAVERI (*pro hac vice*)  
 JOSEPH SAVERI LAW FIRM, INC.  
 601 California Street, Suite 1000  
 San Francisco, California 94108  
 Telephone: (415) 500-6800  
 Facsimile: (415) 395-9940  
 jsaveri@saverilawfirm.com

*Attorneys for Individual and Representative  
 Plaintiffs Kajan Johnson, Clarence Dollaway,  
 and Tristan Connelly*

CHRISTOPHER S. YATES (*pro hac vice*)  
 chris.yates@lw.com  
 LATHAM & WATKINS LLP  
 505 Montgomery Street, Suite 2000  
 San Francisco, CA 94111

WILLIAM A. ISAACSON (*pro hac vice*)  
 wisaacson@paulweiss.com  
 JESSICA PHILLIPS (*pro hac vice*)  
 jphillips@paulweiss.com  
 PAUL, WEISS, RIFKIND, WHARTON &  
 GARRISON LLP  
 2001 K Street, NW  
 Washington, DC 20006

DONALD J. CAMPBELL  
 J. COLBY WILLIAMS  
 CAMPBELL & WILLIAMS  
 710 South Seventh Street, Ste. A  
 Las Vegas, NV 89101  
 Telephone: (702) 382-5222  
 Facsimile: (702) 382-0540  
 Email: djc@cwlawlv.com  
 Email: jcw@cwlawlv.com

*Attorneys for Defendants Zuffa LLC, TKO  
 Operating Company, LLC, and Endeavor Group  
 Holdings, Inc.*

[Additional Counsel Listed on Signature Page]

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Kajan Johnson, Clarence Dollaway, and Tristan  
 Connelly, on behalf of themselves and all others  
 similarly situated,

Plaintiffs,

v.

Zuffa LLC, TKO Operating Company, LLC f/k/a  
 Zuffa Parent LLC (d/b/a Ultimate Fighting  
 Championship and UFC) and Endeavor Group  
 Holdings, Inc.,

Defendants.

No.: 2:21-cv-01189-RFB-BNW

**JOINT STIPULATION TO PLAINTIFFS'  
 FILING OF SECOND AMENDED  
 COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), LR 7-1, and LR IA 6-2, the parties hereby stipulate to Plaintiffs' filing of their proposed Second Amended Complaint, as set forth in the parties' April 30, 2025 Joint Stipulation to Address Defendant Zuffa's Motion to Deny Class Certification or, in the Alternative, Strike Class Allegations, ECF No. 191. In accordance with LR 15-1, the proposed Second Amended Complaint is attached as Exhibit A. The foregoing stipulation does not affect any other existing Court deadlines or scheduling previously set in this case.

Dated: May 9, 2025

Respectfully submitted,

/s/ Michael Dell'Angelo

/s/ Christopher S. Yates

Eric L. Cramer (admitted *pro hac vice*)  
 Michael Dell'Angelo (admitted *pro hac vice*)  
 Patrick F. Madden (admitted *pro hac vice*)  
 BERGER MONTAGUE PC  
 1818 Market Street, Suite 3600  
 Philadelphia, PA 19103  
 Telephone: (215) 875-3000  
 Facsimile: (215) 875-4604  
 ecramer@bm.net  
 mdellangelo@bm.net  
 pmadden@bm.net

Joshua P. Davis (admitted *pro hac vice*)  
 Robert C. Maysey (admitted *pro hac vice*)  
 BERGER MONTAGUE PC  
 505 Montgomery Street, Suite 625  
 San Francisco, CA 94111  
 Telephone: (415) 906-0684  
 Facsimile: (215) 875-4604  
 jdavis@bm.net  
 rmaysey@bm.net

Christopher S. Yates (*Pro hac vice*)  
 chris.yates@lw.com  
 Aaron T. Chiu (*Pro hac vice*)  
 aaron.chiu@lw.com  
 LATHAM & WATKINS LLP  
 505 Montgomery Street, Suite 2000  
 San Francisco, CA 94111  
 Tel: (415) 395-8095

Sean M. Berkowitz (*Pro hac vice*)  
 sean.berkowitz@lw.com  
 LATHAM & WATKINS LLP  
 330 North Wabash Ave, Suite 2800  
 Chicago, IL 60611

Laura Washington (*Pro hac vice*)  
 laura.washington@lw.com  
 LATHAM & WATKINS LLP  
 10250 Constellation Blvd, Suite 1100  
 Los Angeles, CA 90067

David L. Johnson (*Pro hac vice*)  
 david.johnson@lw.com  
 LATHAM & WATKINS LLP  
 555 Eleventh Street NW, Suite 1000  
 Washington, D.C. 200046

Joseph R. Saveri (admitted *pro hac vice*)  
 Kevin E. Rayhill (admitted *pro hac vice*)  
 Chris Young (admitted *pro hac vice*)  
 JOSEPH SAVERI LAW FIRM  
 601 California Street, Suite 1000  
 San Francisco, California 94108  
 Telephone: (415) 500-6800  
 Facsimile: (415) 395-9940  
 jsaveri@saverilawfirm.com  
 krayhill@saverilawfirm.com  
 cyoung@saverilawfirm.com

Benjamin D. Brown (admitted *pro hac vice*)  
 Richard A. Koffman (admitted *pro hac vice*)  
 Daniel H. Silverman (admitted *pro hac vice*)  
 Daniel Gifford (admitted *pro hac vice*)  
 COHEN MILSTEIN SELLERS  
 & TOLL, PLLC  
 1100 New York Ave., N.W., Suite 500, East  
 Tower Washington, DC 20005  
 Telephone: (202) 408-4600  
 Facsimile: (202) 408 4699  
 bbrown@cohenmilstein.com  
 rkoffman@cohenmilstein.com  
 dsilverman@cohenmilstein.com  
 dgifford@cohenmilstein.com

W. Joseph Bruckner (admitted *pro hac vice*)  
 Brian D. Clark (admitted *pro hac vice*)  
 LOCKRIDGE GRINDAL NAUEN PLLP  
 100 Washington Ave S, Suite 2200  
 Minneapolis, MN 55401  
 Telephone: (612) 596-4001  
 Facsimile: (612) 339-0981  
 wjbruckner@locklaw.com  
 bdclark@locklaw.com

Kyle Pozan (admitted *pro hac vice*)  
 LOCKRIDGE GRINDAL NAUEN PLLP  
 1165 N. Clark Street, Ste. 700  
 Chicago, IL 60610  
 Telephone: (612) 339-6900  
 kjpozan@rlocklaw.com

*Attorneys for Plaintiffs Kajan Johnson, Clarence  
 Dollaway, and Tristan Connelly and the Proposed  
 Class*

William A. Isaacson (*Pro hac vice*)  
 wisaacson@paulweiss.com  
 Karen L. Dunn (*Pro hac vice*)  
 kdunn@paulweiss.com  
 Jessica Phillips (*Pro hac vice*)  
 jphillips@paulweiss.com  
 PAUL, WEISS, RIFKIND, WHARTON  
 & GARRISON LLP  
 2001 K Street, NW  
 Washington, DC 20006

Brette M. Tannenbaum (*Pro hac vice*)  
 btannenbaum@paulweiss.com  
 Yotam Barkai (*Pro hac vice*)  
 ybarkai@paulweiss.com  
 PAUL, WEISS, RIFKIND, WHARTON  
 & GARRISON LLP  
 1285 Avenue of the Americas  
 New York, NY 10019

Donald J. Campbell  
 J. Colby Williams  
 CAMPBELL & WILLIAMS  
 710 South Seventh Street, Ste. A  
 Las Vegas, NV 89101  
 Telephone: (702) 382-5222  
 Facsimile: (702) 382-0540  
 Email: djc@cwlawlv.com  
 Email: jcw@cwlawlv.com

*Attorneys for Defendants Zuffa LLC, TKO  
 Operating Company, LLC, and Endeavor Group  
 Holdings, Inc.*

1 Michael J. Gayan  
2 CLAGGET & SYKES  
3 4101 Meadows Lane, Ste. 100  
4 Las Vegas, NV 89107  
5 Telephone: (702) 333-7777  
6 Fax: (702) 655-3763

7 *Liaison Counsel for Plaintiffs Kajan Johnson,*  
8 *Clarence Dollaway, and Tristan Connelly and*  
9 *the Proposed Class*

10 IT IS SO ORDERED:

11 \_\_\_\_\_  
12 UNITED STATES DISTRICT JUDGE

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14 DATED: \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was served on May 9, 2025, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

Date: May 9, 2025

/s/ Michael Dell'Angelo

Michael Dell'Angelo